

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION

PROTRADENET LLC

*Plaintiff.*

v.

PREDICTIVE PROFILES, INC.

*Defendant.*

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§  
§ Consolidated  
§ Civil Action No. 6:18-CV-38-ADA

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PREDICTIVE PROFILES, INC.

*Plaintiff,*

v.

PROTRADENET, LLC AND DWYER  
FRANCHISING, LLC,

*Defendants.*

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**PROTRADENET AND DWYER'S PRETRIAL DISCLOSURES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW PROTRADENET LLC AND DWYER FRANCHISING LLC and file this their Pretrial Disclosures pursuant to this Court's Amended Scheduling Order (ECF 58), Local Rule CV 16-2(e) and this Court's Text Order of October 2, 2019.

1. **A List of Stipulated Facts**

At the time of the filing of this disclosure, the parties have not stipulated to any facts. However, based on the pre-trial filings being exchanged by the parties, PTN and Dwyer intend to request conference with Predictive regarding Findings of Fact exchanged and determine what facts can be stipulated, thus allowing a joint advising to the Court of such in advance of the pre-trial hearing.

**2. An Appropriate Identification of Each Exhibit**

PTN and Dwyer's Exhibit List is attached as Exhibit A. Per this Court's Jury Evidence Recording System (JERS) Requirements, PTN and Dwyer will submit the electronic versions of the documents in Exhibit A in proper form on October 16, 2019. All exhibits listed on Exhibit A have either been produced in discovery or filed with the Court. Accordingly, they are identified by bates number or ECF number.

**3. Witness List**

PTN and Dwyer's Witness List is attached as Exhibit B.

**4. Witnesses to be Presented by Deposition Testimony**

Not applicable.

**5. Proposed Findings of Fact and Conclusions of Law**

PTN and Dwyer's Proposed Findings of Fact and Conclusions of Law are attached as Exhibit

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**6. Estimated Probable Length of Trial**

PTN and Dwyer anticipate that trial can be conducted in two (2) days.

Respectfully submitted,

/s/ Jim Dunnam  
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ATTORNEYS FOR PROTRADENET AND  
DWYER

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing has been sent via the Court's electronic filing system to counsel for Predictive Profiles on October 4, 2019.

/s/ Jim Dunnam  
Jim Dunnam